REMARKS

Claims 1-24 are pending in the application.

Claims 1-24 have been rejected.

Claims 1, 7 and 13 have been amended as set forth herein.

Claims 1-24 remain pending in this application.

Reconsideration of the claims is respectfully requested.

I.   CLAIM REJECTIONS -- 35 U.S.C. § 103

Claims 1-24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent

Publication No. 2003/0069955 to *Gieseke, et al.* (hereinafter "Gieseke") in view of Applicant's own

Admitted Prior-Art (hereinafter "AAPA"). The Applicant respectfully traverses the rejection.

In *ex parte* examination of patent applications, the Patent Office bears the burden of

establishing a prima facie case of obviousness. MPEP § 2142, p. 2100-133 (8th ed. rev. 4, October

2005). Absent such a prima facie case, the applicant is under no obligation to produce evidence of

nonobviousness. *Id.* To establish a *prima facie* case of obviousness, three basic criteria must be

met: *Id.* First, there must be some suggestion or motivation, either in the references themselves or in

the knowledge generally available to one of ordinary skill in the art, to modify the reference or to

combine reference teachings. *Id.* Second, there must be a reasonable expectation of success. *Id.*

Finally, the prior art reference (or references when combined) must teach or suggest all the claim

limitations. *Id.* The teaching or suggestion to make the claimed combination and the reasonable

expectation of success must both be found in the prior art, and not based on applicant's disclosure. *Id.*

Amended independent Claim 1 requires a first object-oriented telecommunication device that comprises an object conduit management information base (MIB) manager that is capable of generating an MIB data structure, where the MIB data structure represents a plurality of objects in a second object-oriented telecommunication device. In contrast, Gieseke describes an object-oriented SNMP agent for a first network element that models only the components of the first network element. Gieseke does not describe the SNMP agent modeling objects of a second network element.

For at least these reasons, amended independent Claim 1 and Claims 2-6, which depend from Claim 1, are patentable over Gieseke. Amended independent Claim 13 recites limitations analogous to the novel and non-obvious limitations emphasized in traversing the rejection of Claim 1. Therefore, Claim 13 and Claims 14-24, which depend from Claim 13, also are patentable over Gieseke.

Amended independent Claim 7 recites a first object-oriented telecommunication device comprising an object conduit management information base (MIB) agent that is capable of receiving an MIB data structure from a second object-oriented telecommunication device. Using the MIB data structure, the MIB agent is capable of invoking a method of a first object of a plurality of objects executable by processing circuitry associated with the first object-oriented telecommunication device.

In contrast, Gieseke describes an SNMP agent that receives SNMP get messages, SNMP set messages, and CLI command messages. The Applicants are unable to find in Gieseke any description of such messages including an MIB data structure, as recited in Claim 7. For at least these reasons, amended independent Claim 7 and Claims 8-12, which depend from Claim 7, are patentable over Gieseke.

Accordingly, the Applicant respectfully requests that the Examiner withdraw the § 103 rejection with respect to Claims 1-24.

CONCLUSION

As a result of the foregoing, the Applicant asserts that the remaining Claims in the Application are in condition for allowance, and respectfully requests an early allowance of such Claims.

If any issues arise, or if the Examiner has any suggestions for expediting allowance of this Application, the Applicant respectfully invites the Examiner to contact the undersigned at the telephone number indicated below or at *jmockler@munckcarter.com*.

The Commissioner is hereby authorized to charge any additional fees connected with this communication or credit any overpayment to Deposit Account No. 50-0208.

Respectfully submitted,

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